

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

USDC SDNY	Southern District of New York
DOCUMENT	Jennifer L. Brown
ELECTRONICALLY FILED	Attorney-in-Charge
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BY ECF

The Honorable Judge Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Jonas Brito
20 Cr. 200 (KMW)

Honorable Judge Wood:

I write to provide the Court with an update about Jonas Brito. Today, the defense spoke with Mr. Brito and learned that he is currently suffering from acute medical and mental health issues for which he has been receiving residential treatment in Pennsylvania following hospitalization in New York City in late December 2020. Upon learning this information, the defense immediately contacted pretrial services and the Government to apprise them of the situation. The defense has since spoken with Mr. Brito's counselor, who confirmed that he is residing in the facility. Mr. Brito contacted his pretrial services officer, who requested a letter from Mr. Brito's counselor; Mr. Brito expects to furnish the letter tomorrow.

Given Mr. Brito's otherwise strong history of compliance with the conditions of his release, the defense's primary concern is Mr. Brito's well-being; we have no reason to believe that Mr. Brito meaningfully or intentionally violated the conditions of his release. Recognizing his need for treatment, Mr. Brito sought medical care. Accordingly, the defense respectfully requests that the Court modify Mr. Brito's conditions of release to allow him to remain in Pennsylvania for residential treatment.

Further, in light of this information, the defense respectfully requests a four-week extension to file Mr. Brito's pretrial motions, which are currently due February 5, 2021. This adjournment is necessary to enable the defense to consult with Mr. Brito about the motions and this case. The Government consents to this request.

Pretrial motions are due by
March 5, 2021.

The Government shall respond
to the request to modify bail
conditions by February 19, 2021.

Respectfully submitted,

/s/
Marne Lenox
Assistant Federal Defender
(212) 417-8721

cc: Peter Davis, Assistant U.S. Attorney (by ECF)
Vincent Adams, U.S. Pretrial Services Officer (by e-mail)

Marne M. Lenox

2/5/21

So ORDERED